



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Ref: EPR-ER

**PROGRESS POLREP
Grand Junction Trailer Site
Grand Junction, Mesa County, Colorado**

I. HEADING

Date: 06/03/03
From: Floyd Nichols, On Scene Coordinator
Agency: EPA/8
Unit: Region VIII - Emergency Response Program
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To: Kevin Gould, EPA Headquarters
POLREP No: POLREP # 2
Site: Grand Junction Trailer

II. BACKGROUND

Site Number: 08-GL
Party Conducting the Action: EPA
Response Authority: CERCLA
NPL Status: No
Action Memorandum Status: 05/1903
Date Action Started: 05/19/03
Completion Date: TBD

III. SITE INFORMATION

A. Incident Category

Enforcement-Lead Removal Action

B. Site Description

1. Site description

The Grand Junction Trailer Site is located at 2489 and 2468 Commerce Boulevard,

Grand Junction, Colorado. The Site consists of two equipment storage lots which are a part of a closed commercial/industrial facility in the western edge of Grand Junction. More specifically, the Site consists of the area where a semi-trailer is currently parked (near the SW corner of the 2468 location) and a second area (the 2489 location), about 300 yards away, where the semi-trailer was previously parked. At the time of the initial response, the trailer reportedly contained 250 5-gallon pails of sodium dichromate, and an undetermined quantity of sodium dichromate which has been released from the pails onto the trailer floor and onto the ground surfaces beneath and surrounding the trailer. The Site is immediately surrounded by other commercial/industrial properties. Further afield, the Site is surrounded by mixed commercial, industrial, and residential properties, a shopping mall is three blocks west of the Site, and an active irrigation ditch is approximately 1 ½ blocks north of the Site. At various times of the year, ground water, reportedly, exists at 6-9 feet below the Site.

2. Site evaluation

The Site has a history of problems with and concerns by the Colorado Department of Public Health and Environment (CDPHE) - Resource Conservation and Recovery Act (RCRA) staff. According to CDPHE, sodium dichromate has been improperly stored by the PRP in 5-gallon pails in the semi-trailer for many years, and many of the containers have burst and/or are leaking. The trailer was moved to its present location in late 2002, and it is possible that the ground surface/subsurface at its present and previous (parking) location is contaminated. EPA's Criminal Investigation Division (CID) and CDPHE have photos and anecdotal information which illustrate that many of the containers have burst and/or are leaking onto the ground and, possible, migrating away from the Site via sheet-flow runoff, through rain water percolation into the shallow, underlying aquifer, or from winds.

3. Description of threat

According to photos and information obtained by CID and CDPHE, numerous small containers of sodium dichromate, a strong oxidizer, are leaking onto the floor of the semi-trailer and onto the soil below and around the trailer. Sodium dichromate is a hazardous substance as defined by Section 101 (14) of CERCLA; it is harmful or fatal if swallowed and contact with the skin may cause a rash or external ulcers.

IV. RESPONSE INFORMATION

A. Situation

1. Initial Removal actions

EPA/8 resources, including two OSC, three START and one ERRS, were mobilized to Grand Junction to support CID and CDPHE Site-entry personnel. On 05/19/03, a Warrant was obtained by EPA CID for access to the Site, and the Warrant was served on the PRP the next day. Immediately thereafter, several CID agents and representatives, with assistance from the Grand Junction Fire Department (GJFD), the Grand Junction

Police Department, CDPHE, and EPA, entered the Site, conducted simultaneous PRP and source(s) interviews, and secured documentary and/or forensic samples. In addition, the PRP signed an OSC-presented Consent for Access to Property form, and discussed AOC-related issues with an EPA enforcement specialist. **Also, the PRP, after signing the Access Consent, gave the OCS permission for unrestricted access to fenced lots at 2468 Commerce Blvd and at 2489 Commerce Blvd, combination for the locks on all access gates, and keys to and permission to use facilities in the building just east of the trailer (at 2468).** At CDPHE's request, the GJFD provided labor, breathing air, decon services, and other personnel and logistical support to all the entry teams for the period of time the Warrant was open.

The OSC and other response personnel provided backup support during the entry/collection/evidence gathering efforts. After CID had completed collection of the appropriate forensic samples, the OSC immediately initiated a Removal action to stabilize the site, containerize and/or overpack loose contaminants and damaged containers, and otherwise stage the material in preparation for removing the haz wastes from the site.

At the outset, the OSC had scheduled augmentation of the initial START and ERRS teams with four more ERRS personnel, sufficient to complete Site stabilization, once the CID team had completed its work and closed the Warrant. Just before the heavy, physical work began however, the GJFD gave notice of its intent to downsize and/or demobilize its extensive support contingent concurrent with demobilization of the CID team. At the same time, because daytime temperatures at the Site had already reached 80 degrees and were predicted to go much higher in the next few days, the OSC determined that working conditions in and around the trailer required continuous use of PPE Level B equipment by all entry personnel. Therefore, in order to continue with a timely, continuous Removal, the OSC staffed-up both START and ERRS crews with an additional six people, each. Once on Site, the full complement would then be fully-utilized during Site-entry activities. To support the continued operations, GJFD agreed to provide backup- and infrastructure-support services through Removal completion. In addition, a response team from the US Coast Guard - Pacific Strike Team, was activated to the Site so as to provide OSC support and continuing Federal presence through to completion of initial Site activities.

3. Removal information

20 May: Afternoon - response and support crews mobilized to Site. EPA Removal personnel assisted CID with collection of forensic samples (PPE - level B). GJFD implemented UC/IC Structure and designated key personnel. Demob at sunset.

- **CDPHE scanned both locations for rad (nothing above background).**
- **Forensic samples collected along the south fence at the 2489 location.**
- **START performing haz cat for all samples.**
- **GJFD staged a support zone at 2468, implemented UC/IC, and designated key personnel.**
- **CID and CO AG collected forensic samples from within and around the trailer.**

21 May: Continued with collection of forensic and documentary samples (PPE - Level B). Transition from evidence-collection efforts to stabilization activities. OSC maintained existing UC/IC structure and key assignments. 3-person entry crews (START, EPA, CDPHE, and GJFD mixtures) began bagging and removing wastes from trailer:

- **First trailer entry (PPE - Level B) made just before noon by CDPHE and GJFD team.**
- **START provided haz cat, as appropriate.**
- **START installed and operated perimeter air monitoring network.**
- **Entry crews removed containers of incompatible organic material from the trailer and placed them in a small overpack (1-gal paint, 1-gal thinner, 1-qt motor oil, and 1-gal antifreeze).**
- **Entry team removed single container of hydrogen peroxide and staged outside the trailer, near the overpack.**
- **First roll-off container arrived on site and staged next to trailer's side door.**
- **Teams bagged and removed sodium dichromate to the roll-off (2X in Level B inside the trailer and 1X in Level C (w/APR) in the roll-off).**
- **Upgraded PPE for person working inside the roll-off (possibility of direct contamination from a ruptured bag).**
- **Site work hampered by need to maintain PPE Level B for all entry crews: Accompanying need for heavy infrastructure to support continuous 30-minute crew rotations due to cramped working space in the trailer and high afternoon temperatures.**
- **CID and CDPHE personnel demobilized from the Site at COB. CID closed the Search Warrant as they departed the site.**
- **Additional START and ERRS personnel mobilized to Grand Junction, and PST activated to provide Federal presence and assist with oversight.**
- **Building keys delivered to Vickie Barber, CO AG, for return to PRP's Attorney.**

22 May: Mobilized to the Site with expanded START and ERRS crews and diminished GJFD support (GJFD provided UC/IC structure and assignments, a mobile air compressor, fire protection, decontamination, communications, site security, EMT, and medical monitoring).

- **Tarp cover suspended above the roll-off in order to provide shade to crew(s) working inside the roll-off.**
- **Continued with sodium dichromate bagging, as before, using rotating START and ERRS entry teams in PPE Level B. (Crews initially limited to 30-minute entries, later reduced to 20-minute once the extreme daytime temperatures began to take its toll.)**
- **PST arrived at midday and briefed into the site.**
- **EPA/Nichols and Myers demob'ed in mid afternoon.**

23 May: Mobilized to the site with START and ERRS crews with GJFD support (GJFD provided UC/IC structure and assignments, a mobile air compressor, fire protection, decontamination, communications, site security, EMT, and medical monitoring).

- Continued with sodium dichromate bagging using START and ERRS 3-person entry teams, PPE Level B.
- Second roll-off arrived and positioned next to the trailer.
- Entry teams completed sodium dichromate bagging and secured all waste material in the roll-off's
- Entry teams began trailer decontamination using a hepa vac system.
- START personnel demobilized at COB.
- Approximately 98% of the trailer decontaminated by COB.
- ERRS crew secured the roll-off containers in an adjacent building to await off-site disposal of the contents.

24 May: Mobilized to the Site with ERRS crews with GJFD support (a mobile air compressor). Completed decontamination of the trailer and surrounding surface areas. PST and ERRS personnel demobilized.

- Small soil area (approximately 3X3) below and to the rear of the trailer's side door which showed surface discoloration was excavated into a plastic bag. The bag was placed into the second roll-off.
- Trailer stairs and floor, footpath between trailer and decon station, soils beneath the trailer, and other appropriate areas, sprayed with ferris sulfate solution.
- Decon water solidified with Portland cement.
- ERRS stowed their response gear, cleaned, locked and secured the storage building, then demobilized.

4. Pending Issues

- Transportation of the loaded roll-off's and disposal of the wastes.
- Return of the roll-off's to the point-of-origin
- Subsurface investigation at the 2468 location to determine extent of contamination.

5. Next Steps

Site work will continue until the hazardous waste has been packaged for shipment and the trailer has been adequately decontaminated. Following staging of the contaminants into a rolloff container, contaminated soil and/or debris may be excavated from areas around the trailer, and any excavated material added to the waste stream destined for offsite disposal.

After initial Site stabilization, the PRP will be given the opportunity to conduct the remainder of the Removal: transporting the hazardous waste to an appropriate disposal location; disposing of the hazardous waste; and conducting any appropriate, followup environmental investigation and/or cleanup. Appropriate monitoring wells may be installed at the Site so as to determine the full extent of contamination. If further contamination is detected, additional removal of deeper Site-soils may be initiated.

Transportation and disposal are pending.

6. State and Local Role

Local and state personnel directly participated in all Site-related activities, and will continue to participate, as appropriate, in all post-Removal actions and/or decisions.

V. COST INFORMATION

Total costs for this Enforcement-Lead Removal are not available at this time. Approximate cost to date:

START:	\$14,110
ERRS:	21,000*
USCG:	2,904

* +T&D

VI. DISPOSITION OF WASTES:

All 5 gal buckets containing the sodium dichromate were bagged, then placed in a roll-off container to await transportation to a permitted disposal facility. Other trailer contents, including broken-up pallets and items placed in the small overpacks, were placed in the second roll-off container to await transportation to a permitted disposal facility. The trailer was decontaminated, and the recovered material, along with soils excavated from below the trailer's side door, were placed in the second roll-off. All decon water was solidified, and the resulting material, along with discarded PPE, was also placed into the second roll-off.